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Via electronic filing

Mr. James McAllister
Senior Campaign Finance Analyst
Reports Analysis Division
Federal Election Commission
999 E Street, NW
Washington, DC 20463

Re:ID Number C00531624, 12-Day Pre-General Report

Dear Mr. McAllister:

This letter responds to your request for additional information dated December 12, 2012 regarding the 2012 12-Day Pre-General Report filed by Local Voices (the "PAC"). Your request sought information about two transactions: a \$43.77 payment to Simply Delicious in Springfield, Ohio, and a \$5,444.62 payment to Less Productions in Cleveland, Ohio.

The 48-hour report filed by Local Voices on October 15, 2012 disclosed payments to Simply Delicious on October 11 and October 12, 2012. Each reported payment was \$43.77. The October 12 entry was an error caused by a difference between the date on which staff reported the payment and the date on which the bank processed the payment. The PAC's production crew ate at Simply Delicious only once, on October 11. The PAC's October 11 Simply Delicious expenditure was accurately disclosed on Schedule E of the PAC's timely filed Pre-General Election report. Federal Election Commission ("Commission") regulations do not require a political committee to amend a 48-hour report when an organization subsequently discovers an error; rather, the committee must file an accurate accounting of its expenditures on its next regularly-scheduled report. For this reason, the PAC did not amend its October 15 report to remove the second Simply Delicious entry. (It is also unclear under the Commission's regulations and Schedule E reporting instructions that such an expense, which does not directly relate to the independent expenditure's creation or distribution, must be reported at all.)

The payment to Less Productions related to television production costs for an independent expenditure that was publicly distributed on November 3, 2012. Commission regulations require that the Commission receive reports of independent expenditures by 11:59 p.m. Eastern Standard/Daylight Time on the day following the date on which a communication is publicly distributed, if the independent expenditures aggregate \$1,000 or more and are made less than 20 days before the election to which the expenditures relate. 11 CFR § 104.4(c). The PAC first disclosed the Less Productions payment on an amended 48-hour notice of independent expenditures it filed with the Commission on October 27. This was eight days earlier than required by Commission regulations, as the PAC was not required to file a 24-hour report until November 4, 2012. The PAC also disclosed this payment to Less Productions on Schedule E of its timely filed Post-General Election report.

To remedy the situation, the PAC has amended its reports as follows:

1. Amended Pre-General Election Form 3X, Schedule B to report a disbursement on October 16, 2012 to Less Productions for \$5,444.62;
2. Amended Post-General Election Form 3X, Schedule B to show a negative entry on November 3, 2012 for the disbursement to Less Productions; and
3. Amended Post-General Election Form 3X, Schedule E to report the date of the independent expenditure as November 3.

I hope this addresses your request for information. If you have any questions, please don't hesitate to contact me.

Sincerely,

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Houston King
Treasurer
Local Voices